

STIP
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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

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Case No.: 2:19-CR-252-JAD-DJA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERTO D. HERNANDEZ,

Defendant,

**Stipulation and Order to Continue
Sentencing
(First Request)**

IT IS HEREBY STIPULATED AND AGREED , by and between JASON M. FRIERSON, United States Attorney, and EDWARD VERONDA, ESQ., Assistant United States Attorney, counsel for the United States of America, and Matthew Stromenger, counsel for ROBERTO D. HERNANDEZ, that the Sentencing and Disposition currently scheduled for April 24, 2023 at 10:00 a.m. be continued for not less than four (4) weeks to a date convenient for the Court.

The Stipulation is entered into for the following reasons:

1. This is the first Sentencing and Disposition continuance request.
2. Counsel for Defendant just received the Pre-Sentence Investigation Report and needs time to review it. Additionally, Defendant is expecting to file a Sentencing Memorandum.

- 1 3. Defendant Hernandez is not incarcerated and does not object to the
2 continuance.
3 4. The parties agree to the continuance.
4 5. Additionally, denial of this request for continuance could result in a
5 miscarriage of justice.
6 6. For the above stated reasons, the parties agree that a continuance of the
7 Sentencing and Disposition would best serve the ends of justice in this case.
8

9 Dated this 13th day of April, 2023.
10

11 Dated: April 13, 2023

12 By: /s/ Edward Veronda
13 EDWARD VERONDA, ESQ.
Assistant United States Attorney

14 Dated: April 13, 2023

15 By: /s/ Matthew Stromenger
16 MATTHEW STROMENGER, ESQ.
Counsel for ROBERTO D. HERNANDEZ
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IN THE UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,

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ROBERTO D. HERNANDEZ,

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Case No.: 2:19-CR-252-JAD-DJA

FINDING OF FACTS

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. This is the first Sentencing and Disposition continuance request.
2. Counsel for Defendant needs additional time to finalize negotiations to resolve the case.
3. Defendant Hernandez is not incarcerated and does not object to the continuance.
4. The parties agree to the continuance.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. For the above stated reasons, the parties agree that a continuance of the Sentencing and Disposition would best serve the ends of justice in this case.

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ORDER

IT IS THEREFORE ORDERED that Sentencing and Disposition currently scheduled for April 4, 2023 at 2:00 p.m. to be continued to May 30, at 11:00 a.m.

Dated this 14th day of April, 2023.


UNITED STATES DISTRICT JUDGE

Respectfully Submitted By:

/s/ Matthew Stromenger
Matthew Stromenger, Esq.
Nevada Bar No. 15464
Attorney for Defendant